	Case 2:21-bk-18205-DS Doc 90 Filed 12/30 Main Document	0/21 Entered 12/30/21 11:04:27 Desc Page 1 of 6				
1 2 3 4 5 6 7 8 9	DAVID B. GOLUBCHIK (State Bar No. 185520) TODD M. ARNOLD (State Bar No. 221868) LINDSEY L, SMITH (State Bar No. 265401) LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P. 2818 La Cienega Avenue Los Angeles, California 90034 Telephone: (310) 229-1234 Facsimile: (310) 229-1244 Email: dbg@lnbyg.com; tma@lnbyg.com; lls@lnbyg.com Attorneys for Debtor and Debtor in Possession  UNITED STATES BANKRUPTCY COURT					
10	CENTRAL DISTRI	CT OF CALIFORNIA				
11	LOS ANGE	LES DIVISION				
12	In re:	Case No.: 2:21-bk-18205-DS				
13	CRESTLLOYD, LLC,	Chapter 11 Case				
14	Debtor and Debtor in Possession.	STIPULATION TO CONTINUE HEARING				
15 16	Debtor and Debtor in Possession.	ON MOTION OF THEODORE LANES, COURT-APPOINTED RECEIVER, AND				
17		BRUTZKUS GUBNER ROZANSKY SEROR WEBER LLP FOR ENTRY OF				
18		ORDERS ALLOWING AND DIRECTING IMMEDIATE PAYMENT OF				
19		ADMINISTRATIVE EXPENSE CLAIMS PURSUANT TO 11 U.S.C. §§ 543(c),				
20		503(b)(3)(E), AND 503(b)(4)				
21		[No Hearing on Stipulation Required]				
22		Current Hearing Date:				
23		Date: January 13, 2022 Time: 11:30 a.m.				
24		Place: Courtroom 1639 255 E. Temple St.				
25		Los Angeles, CA 90012 VIA ZOOM ONLY				
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This Stipulation To Continue Hearing On Motion Of Theodore Lanes, Court-Appointed Receiver, And Brutzus, Gubner, Rozansky, Seror Weber LLP For Entry Of Order Allowing And Directing Immediate Payment Of Administrative Expense Claims Pursuant To 11 U.S.C. §§ 543(c), 503(b)(3)(E), And 503(b)(4) ("Stipulation") is entered into by and between Crestlloyd, LLC, the Chapter 11 debtor and debtor in possession herein (the "Debtor"), Theodore Lanes, Court-Appointed Receiver (the "Receiver") and the United States Trustee (the "UST" together with the Debtor and the Receiver, the "Parties"), with respect to the following:

## **RECITALS**

- A. On October 26, 2021, the Debtor commenced this bankruptcy case by filing a voluntary petition under Chapter 11 of the Bankruptcy Code.
- B. On December 23, 2021, the Receiver filed that certain Motion Of Theodore Lanes, Court-Appointed Receiver, And Brutzus, Gubner, Rozansky, Seror Weber LLP For Entry Of Order Allowing And Directing Immediate Payment Of Administrative Expense Claims Pursuant To 11 U.S.C. §§ 543(c), 503(b)(3)(E), And 503(b)(4) [Docket No. 84] and Notice Of Motion For Motion Of Theodore Lanes, Court-Appointed Receiver, And Brutzus, Gubner, Rozansky, Seror Weber LLP For Entry Of Order Allowing And Directing Immediate Payment Of Administrative Expense Claims Pursuant To 11 U.S.C. §§ 543(c), 503(b)(3)(E), And 503(b)(4) [Docket No. 85] (collectively, the "Motion").
- C. The Hearing on the Motion is currently scheduled for January 13, 2022 at 11:30 a.m. (the "Hearing").
- D. After the filing of the Motion, the Parties engaged in discussions regarding the Motion and as a result of such discussions have agreed to request that the Court continue the Hearing on the Motion and all related pleadings deadlines (including the deadlines to file oppositions to the Motion and replies thereto) in order to allow the Parties time to resolve issues that may affect the outcome and relief sought in the Motion.

NOW, THEREFORE, BASED ON THE FOREGOING RECITALS OF FACT, WHICH ARE INCORPORATED INTO THE AGREEMENT BELOW, SUBJECT TO THE APPROVAL OF THE COURT, THE PARTIES AGREE AS FOLLOWS:

- 1	1				
1	1. The Hearing on the Motion shall be continued to January 27, 2022 at 11:30 a.m. or				
2	to the first available date and time convenient for the Court that is after January 27, 2022.				
3	2. All pleading deadlines, including the deadlines to file oppositions to the Motion				
4	and replies thereto shall be continued in conjunction the continued hearing date such that any				
5	opposition to the Motion shall be required to be filed by no later than fourteen (14) days prior to the				
6	continued hearing date and any replies shall be filed by no later than seven (7) days prior to the				
7	continued hearing date.				
8	IT IS SO STIPULATED.				
9	DATED: December 30, 2021	LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.			
11		By: /s/ Lindsey L. Smith  LINDSEY L. SMITH  Attorneys for Debtor and Debtor in Possession			
13	DATED: December 30, 2021	BRUTZKUS GUBNER			
15 16 17		By:  DAVID SEROR Attorneys for Theodore Lanes, Court-Appointed Receiver			
19	DATED: December 30, 2021	PETER C. ANDERSON UNITED STATES DRUSTEE			
21		By: NOREEN MAROYAN			
22		NOREENA. MADOYAN Attorney for the United States Trustee			
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1	1 1. The Hearing on the Motion shall be c	1. The Hearing on the Motion shall be continued to January 27, 2022 at 11:30 a.m. or				
2	to the first available date and time convenient for the Court that is after January 27, 2022.					
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4		and replies thereto shall be continued in conjunction the continued hearing date such that any				
5		opposition to the Motion shall be required to be filed by no later than fourteen (14) days prior to the				
6		continued hearing date and any replies shall be filed by no later than seven (7) days prior to the				
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8	8 IT IS SO STIPULATED.					
9	9 DATED: December 30, 2021 LEVENE, NEA	LE DENDED MOO				
10	, , , , , , , , , , , , , , , , , , , ,	LE, BENDER, YOO HIK L.L.P.				
11	11 By:/s/ Linds	ey L. Smith				
12	LINDSE	Y L. SMITH ebtor and Debtor in Possession				
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14		JBNEK				
15	15 By: 101					
16	DAVID Attorneys for Th					
17		Receiver				
18	DAMES -					
19		PETER C. ANDERSON UNITED STATES TRUSTEE				
20	되었다. 이 아이들에게 되어 있는데 아이들이 아이들이 되었다. 그렇게 되었다면 하는데 아이들이 되었다면 하다.					
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22		N A. MADOYAN United States Trustee				
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 2818 La Cienega Avenue, Los Angeles, CA 90034.

A true and correct copy of the foregoing document entitled Stipulation to Continue Hearing on Motion of Theodore Lanes, Court-Appointed Receiver, and Brutzkus Gubner Rozansky Seror Weber LLP for Entry of Orders Allowing and Directing Immediate Payment of Administrative Expense Claims Pursuant To 11 U.S.C. §§ 543(C), 503(B)(3)(E), and 503(B)(4) will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

- 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **December 30, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
- Kyra E Andrassy kandrassy@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
  - Todd M Arnold tma@Inbyg.com
  - Jerrold L Bregman jbregman@bg.law, ecf@bg.law
  - Marguerite Lee DeVoll mdevoll@watttieder.com
  - Thomas M Geher tmg@jmbm.com, bt@jmbm.com;fc3@jmbm.com;tmg@ecf.inforuptcy.com
  - David B Golubchik dbg@lnbyg.com, stephanie@lnbyb.com
- James Andrew Hinds jhinds@hindslawgroup.com;mduran@hindslawgroup.com, mduran@hindslawgroup.com
  - Robert B Kaplan rbk@jmbm.com
    - Jane G Kearl jkearl@watttieder.com
    - Jennifer Larkin Kneeland jkneeland@watttieder.com
    - Michael S Kogan mkogan@koganlawfirm.com
  - Noreen A Madoyan Noreen.Madoyan@usdoj.gov
    - Ryan D O'Dea rodea@shulmanbastian.com, lgauthier@shulmanbastian.com
    - Sharon Oh-Kubisch sokubisch@swelawfirm.com, qcruz@swelawfirm.com;1qarrett@swelawfirm.com;jchung@swelawfirm.com
    - Ronald N Richards ron@ronaldrichards.com, morani@ronaldrichards.com
    - Victor A Sahn vsahn@sulmeyerlaw.com, pdillamar@sulmeyerlaw.com;pdillamar@ecf.inforuptcy.com;vsahn@ecf.inforuptcy.com;cblair@sulmeyerlaw.com;cblair@ecf.inforuptcy.com
  - David Seror dseror@bg.law, ecf@bg.law
    - Zev Shechtman zshechtman@DanningGill.com, danninggill@gmail.com;zshechtman@ecf.inforuptcy.com
    - Lindsey L Smith IIs@Inbyb.com, IIs@ecf.inforuptcy.com
    - United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
    - Jessica Wellington jwellington@bg.law, ecf@bg.law

2. <u>SERVED BY UNITED STATES MAIL</u>: On <u>December 30</u>, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge <u>will be completed</u> no later than 24 hours after the document is filed.

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Case	Case 2:21-bk-18205-DS Doc 90 Filed 12/30/21 Entered 12/30/21 11:04:27 Desc Main Document Page 6 of 6							
1	Debtor Crestlloyd, LLC							
2	c/o SierraConstellation Partners LLC 355 S. Grand Avenue Suite 1450 Los Angeles, CA 90071							
3								
4			Service information continued on atta	ched page				
5	3. <u>SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL</u> (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR,							
6	on <b>December 30, 2021</b> , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission							
7	and/or email as follows.	Listing the judge here cor	nstitutes a declaration that personal than 24 hours after the document is	delivery on, or				
8			Service information continued on atta	ched page				
9		f perjury under the laws of th	ne United States of America that the f	oregoing is				
10	true and correct.							
11	December 30, 2021  Date	John Berwick Type Name	/s/ John Berwick Signature					
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	This form is mandatory. It has	s boon approved for use by the Unit	ed States Bankruntov Court for the Central Dis	strict of California				